

FREDERICK U. FIERST*
JOHN P. PUCCI
C. JEFFREY KINDER**
JONATHAN J. KANE***

PETER L. BROOKS ☼
OF COUNSEL

J. LIZETTE RICHARDS****

FIERST, PUCCI & KINDER LLP
ATTORNEYS AT LAW
64 GOTHIC STREET
NORTHAMPTON, MASSACHUSETTS 01060-3042

(413) 584-8067
TELECOPIER (413) 585-0787
EMAIL: (recipient's name)@fierstpucci.com
WEBSITE: www.fierstpucci.com

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JUL 27 2005
U.S. DISTRICT COURT
DISTRICT OF MASSACHUSETTS
NORTHAMPTON

July 25, 2005

Todd Newhouse, Esquire
Assistant U.S. Attorney
U.S. Attorney's Office
1550 Main Street
Springfield MA 01103

Re: U.S. v. Jose Rodriguez, Criminal No. 05-CR-30034-MAP

Dear Mr. Newhouse:

Please consider this letter a request pursuant to Local Rule 116.3(A) for the following additional discovery in the above-captioned criminal case:

1. early disclosure of grand jury transcripts and other Jencks Act material;
2. the identities of and any impeachment material related to any confidential informants who provided information to the government in this case;
3. copies of additional photographs in the government's possession;
4. evidence the government intends to offer pursuant to Fed. R. Evid. 404(b);
5. co-conspirator hearsay statements;
6. evidence of the use of pen registers or trap and trace devices;
7. all documentary evidence related to the testing of the substances allegedly obtained from Jose Rodriguez which testing is summarized in the DEA Form 7 earlier provided.
 - a. the complete DEA laboratory file concerning the analyses of the substances;
 - b. bench notes of the analysts performing the laboratory tests on the substances allegedly obtained from Rodriguez;


* ALSO ADMITTED IN NEW YORK
** ALSO ADMITTED IN COLORADO
*** ALSO ADMITTED IN NEW HAMPSHIRE AND CONNECTICUT
****ALSO ADMITTED IN NEW HAMPSHIRE
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- c. any publications, notes or memoranda upon which any government expert relied in forming an opinion as to the composition and identification of the substances examined;
- d. all analytical data which is relevant to the identification of the substance tested;
- e. all analytical data which is relevant to the quantity of the substance tested;
- f. all worksheets, sequence tables, quality control data and target ranges related to the substance tested.

Please call me at (413) 584-8067 if you have any questions.

Very truly yours,



C. Jeffrey Kinder

CJK/hs

Copy to: Clerk, U.S. District Court ✓
Jose Rodriguez